

EXHIBIT H

PROPOSED CARGO PROTOCOL

Nothing in this order shall prohibit or impair the right of any Beneficial Cargo Owner or agent to contract with any third-party or third parties (including, without limitation a Terminal Operator or Cargo Transportation Carrier) at the Beneficial Cargo Owner's or third party's expense based on reasonable or customary rates for such services in connection with obtaining any services necessary or appropriate, in such Beneficial Cargo Owner's reasonable discretion, for such Beneficial Cargo Owner to obtain custody and/or control of such Beneficial Cargo Owner's goods, including, without limitation, to remove such goods from any vessel or any terminal facility or Cargo Transportation Carrier, provided that such Beneficial Cargo Owner has paid to Hanjin the full ocean freight charges. Hanjin shall reasonably cooperate with all such Beneficial Cargo Owner efforts including, without limitation releasing of "line Hold" or bill of lading changes or effectuating "customs clearance" on such goods or other similar action to effectuate the desired result of a Beneficial Cargo Owner. To the extent Hanjin or any other party fails to reasonably cooperate with a Beneficial Cargo Owner, such Beneficial Cargo Owner may request relief from this Court on two (2) business days' written notice. Hanjin's interest in any container containing Beneficial Cargo Owner goods shall not impair the rights of a Beneficial Cargo Owner under this paragraph or excuse compliance by Hanjin with this paragraph. Each Beneficial Cargo Owner that makes any payment pursuant to the terms hereof shall be fully subrogated to the rights, liens and claims of any party paid and otherwise reserves all of its rights to assert a claim against Hanjin on account of any payment made by a Beneficial Cargo Owner pursuant to the terms hereof.

Notwithstanding the stay or injunction imposed herein, to the extent a Terminal Operator, Cargo Transportation Carrier or other possessing Hanjin property obtains payment of charges from third parties owed by Hanjin, the Terminal Operator, Cargo Transportation Carrier, or other party possessing Hanjin property shall be permitted to transfer, relinquish or dispose of such property free and clear of any liens and interests immediately, without further relief from this Court.